

1 A. Correct. So --

2 Q. What criticisms of her
3 performance do you have, may you yet have
4 of Kathy Koch's performance on those
5 dates?

6 A. I'm trying to remember who
7 was in training and I don't remember,
8 because that would tell me -- she
9 wasn't -- the training wasn't being done
10 the way we had the cards and the flip
11 chart and I don't remember who was in
12 that training.

13 Q. You can't remember the
14 specific items on the agenda --

15 A. No.

16 Q. -- that you observed?

17 A. No.

18 Q. You can't remember the
19 specific elements of her use of the flip
20 chart or the cards with which you had
21 some issue?

22 A. I don't remember all the
23 specifics, no.

24 Q. You don't know whether it

1 related to the work of the phlebotomist
2 or OSHA regulations?

3 A. We're in training.

4 Q. Yes. That's part of
5 training, isn't it?

6 A. No. The phlebotomist is
7 trained afterwards on our OSHA. That's
8 an element that comes out afterwards.

9 Q. Well, take a look at the
10 serving training agenda, Exhibit-23, and
11 tell me whether that's assists to refresh
12 your recollection as to specific
13 problems, criticisms of her performance
14 that you had based on your observations
15 on March 10th and/or 11th.

16 A. I don't specifically
17 remember.

18 Q. So you don't remember the
19 basis for your decision to terminate her
20 for poor performance, do you?

21 A. No.

22 Q. That's correct, you do not
23 recall?

24 A. That is correct.